

**Federal Defenders  
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March 7, 2022

**VIA ECF**

The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Lawrence Ray  
20 Cr. 110 (LJL)**

Dear Judge Liman:

We write on behalf of Mr. Ray pursuant to the Court's order to provide further information concerning the evidence the defense seeks to elicit about Claudia Drury's prior sexual conduct under Rule 412.

In addition to the specific acts referenced in Mr. Ray's March 1, 2022 Rule 412 letter to the Court, Mr. Ray seeks to cross examine Drury about a journal entry in government exhibit 1507, which reflects that she [REDACTED] and goes on to detail the encounter. *See* Ex. A. This evidence, like the other evidence the defense sought to introduce under Rule 412 and to which the government and Drury did not object, rebuts the government's theory that Mr. Ray sexually groomed Drury.

The government is in no way prejudiced by the timing of this specific request. While the government represented in Court that it was unaware of the incident to which defense counsel referred, the information was gleaned directly from one of the government's exhibits. For the reasons previously stated in Mr. Ray's original letter motion and because cross examination of this evidence—which the government expressly intends to introduce at trial—“would violate [Mr. Ray's] constitutional rights,” Fed. R. Evid. 412(b)(1), the Court should permit the defense to inquire about this incident to rebut the government's theory that Mr. Ray groomed Drury.

Hon. Lewis J. Liman

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.  
Peggy Cross-Goldenberg, Esq.  
Allegra Glashausser, Esq.  
Neil P. Kelly, Esq.

*Counsel for Lawrence Ray*

cc: Counsel of record

# EXHIBIT A

REDACTED